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VIA CM/ECF

July 7th, 2015

Re: United States v. Rene Cardona
14 CRIM 314 (RA)

The Honorable Ronnie Abrams
United States District Court
Southern District of New York
40 Foley Square
New York, New York 10007

Dear Judge Abrams:

I write to respectfully request a two week extension, to July 27th, 2015, for the defense to file Mr. Cardona's sentencing memorandum. The reason for my request is that I will be on trial with the Honorable Brenda K. Sannes, in the Northern District of New York, commencing July 13th, 2015, which is the day on which Mr. Cardona's sentencing memorandum is currently due. My trial preparations in that case are taking far longer than expected and, just yesterday, Judge Sannes requested briefing on two rather complicated legal issues.

The Government consents to my request for an adjournment provided that the deadline for the Government to file its sentencing memorandum and the sentencing itself are extended by two weeks to August 3rd, 2015, and, to on or around August 21st, 2015, respectively.

This is defense counsel's second request for an extension. The Court granted our first request which was incidental to our request for an extension to file our objections to the PSR (ECF Nos. 83 & 85).

Respectfully,

Merchant Law Group LLP

By: Daniel DeMaria
Daniel DeMaria (DD4130)

cc: Gina Castellano (via CM/ECF)
Andrew DeFilippis (via CM/ECF)
Carlos Moreno (via CM/ECF)